

## **BPI Investment Management Data Privacy Statement**

Maintaining your privacy is an important part of the products and services that we provide. This Privacy Statement, hereafter referred to as “Statement”, explains how we collect, protect, use, and share information when you access our websites and/or apply for and avail of our products and services.

This Statement outlines the general practices of BPI Investment Management, Inc. (“BIMI”), as Fund Manager and Principal Distributor of the ALFM Mutual Funds, in relation to our processes and content which are made available through our network of websites, our online and mobile applications, and social media pages (collectively referred to as “websites”).

### **Our Privacy Practices**

The privacy practices described in this Statement are primarily intended for individuals in the Philippines and are designed to comply with the Data Privacy Act of 2012 (R.A. 10173) and its implementing rules and regulations. When accessing our websites and/or availing of our services from outside the Philippines, you acknowledge and agree that your information may be transferred to and processed in the Philippines following legal and regulatory standards for data protection that may differ from your current or home jurisdictions.

### **What We May Collect From You**

When you apply for or avail of any product or service that BIMI offers or when you interact with our employees, authorized representatives, agents and service providers, we collect your personal information. This may include, among others:

- your name and personal particulars such as contact details, address, birthdate, education;
- specimen signatures;
- government ID details;
- financial information (such as income, expenses, balances, investments, tax, insurance, financial and transaction history, etc);
- employment details;
- business interests and assets;
- images via CCTV and other similar recording devices and processes which may be observed when visiting our offices and/or using our other facilities;
- voice recordings of our conversations with you

We may, as and when necessary, seek to verify or augment these information with third-party entities including government regulators, judicial, supervisory bodies, tax authorities or courts of competent jurisdiction and, in the process, gain additional information about you.

In the course of availing our products and services, we also collect information about your transactions and dealings which include your account activities, movements and interactions with third parties such as merchants and utility companies.

When you access our websites, we may provide information about us as well as information regarding our products and services. If you have enrolled your account as a condition of use, you may conveniently access your accounts through the website. In the course of using our network of websites and electronic platforms, we may collect non-personal information such as those provided by your device which may include the IP address, operating system, browser type and version, and other machine identifiers. We may likewise use web analytics tools, including those of third parties', that use cookies to collect anonymous information and data generated in connection with your activities when you visit the pages and our network of websites.

We may also collect, use and keep your personal opinions or comments made known to us via feedback or responses to surveys or any other interaction that you had with our employees, authorized representatives, agents and service providers.

### **How We Use Your Information**

We use the information collected to deliver and provide the products and services that you have availed to:

- approve, facilitate, administer and process applications and transactions;
- respond to queries, requests and complaints and improve how we interact with you;
- send you statements, billings, notices and other such documents necessary for continued use of our products and services;
- conduct studies and researches for the purpose of reviewing, developing and improving our products and services;
- perform profile analysis, behavioral modeling and analytics to understand needs, preferences and market trends to be able to improve and recommend suitable products and services;
- reach out to you regarding products and services information, including offers, promotions, discounts, rewards; and for personalizing your experience with our various touchpoints such as branches, call center, telemarketing, email, messaging and other channels;
- determine the effectiveness of our marketing efforts and initiatives;
- perform certain protective safeguards against improper use or abuse of our products and services including fraud prevention;
- comply with our operational, audit, administrative, credit and risk management processes, policies and procedures, the terms and conditions governing our products, services, facilities and channels, the Securities and Exchange Commission rules and regulations, legal and regulatory requirements of government regulators, judicial, supervisory bodies, tax authorities or courts of competent jurisdiction, as the same may be amended or supplemented from time to time.
- comply with applicable laws of the Philippines and those of other jurisdictions including the United States Foreign Account Tax Compliance Act (FATCA), the laws on the prevention of money laundering including the provisions of Republic Act No. 9160 (Anti-Money Laundering Act

of 2001, as amended (AMLA) and the implementation of know your customer and sanction screening checks

- perform other such activities permitted by law or with your consent.

### **How We May Share Your Information**

We may share your personal information with our subsidiaries, affiliates and third parties, under an obligation of confidentiality.

- We may share personal information with various units within BPI in order to better understand the way you use our products and services. This will allow us to improve our services and offer you opportunities to obtain such other useful products and services that may deliver greater value to you.
- We may share information with our subsidiaries and affiliates to likewise offer you additional products and services that we believe you might find interesting.
- We may share with third parties that we engaged to support us in delivering our services to you. These may involve anonymous or aggregated information to help improve our products, services, and content.
- We may also engage third parties to help us operate our business. These include support in:
  - complying with legal requirements such as court orders;
  - account servicing and execution of transactions;
  - enforcing our terms of use including or such other applicable policies with respect to the services that we provide;
  - addressing fraud, security or technical issues, to respond to an emergency or otherwise to protect the rights, property or security of our customers or third parties;
  - to carry out all other purposes set out above.

Further, if you are, become, or apply to become a client of any of our subsidiaries and affiliates, BPI and the subsidiary/ies and/or affiliate/s concerned has the option, but not the obligation to, rely upon, use, and share your relevant personal and/or account information for any of the following purposes:

1. To facilitate your account opening or application with the concerned subsidiary/ies or affiliate/s;
2. To validate, consolidate or update your customer information records and/or credit history;
3. To provide consolidated billings, deposit or investment summaries or other reports as you may request;
4. To send you reminders, announcements, promotions, offers, invitations and other notifications;
5. To enroll you in loyalty or similar client-oriented programs of the BPI Group of Companies;
6. For research purposes or to design banking, financial, securities and investment or other related products or services for your use;

7. For promotional and/or marketing activities of BPI or of the concerned subsidiary/ies or affiliate/s; and/or
8. To comply with a legal obligation to which BPI or the concerned subsidiary/ies or affiliate/s is subject.

We may transfer, store, and/or process your personal data outside the Philippines. In doing so, we will comply with the Data Privacy Act and its implementing rules and regulations.

We wish to assure you that we do not, and will not, sell personal data to any third parties. All our engagements with third parties shall be fully compliant with our obligation of confidentiality imposed on us under the applicable agreements and/or terms and conditions or any applicable laws that govern our relationship with you.

### **How We Protect Your Information**

We fully recognize the value of your personal information particularly as it may include sensitive personal information such as your gender, government-issued IDs, etc. Appropriately, we strive to maintain the confidentiality, integrity and availability of your personal information by employing physical, technological and procedural safeguards. We train our employees to properly handle your information. Whenever we engage other companies to provide services for us, we require them to protect personal information aligned with our own security standards.

### **How Long Do We Keep Your Information**

Your personal information shall be retained for as long as the purpose for which it was collected, and such other purposes that you may have consented to from time to time, remains in effect and until such time as it is no longer required nor necessary to keep your information for any other legal, regulatory or business purposes.

### **You Have Rights**

In respecting your rights to privacy, you may opt to tell us:

1. not to send you marketing materials via email;
2. not to share your information with our subsidiaries and affiliates or with other companies that we have business with provided that such information is not critical nor required by applicable laws and regulations in maintaining the services that you have availed with us;
3. to provide you with information that we currently have about you subject to restrictions applied to us as a bank and a company operating in the Philippines by certain laws and regulations;
4. to update your information;
5. about your other concerns relating to how we collect, use, share, protect or dispose your information.

We may charge a fee for processing your request/s for access and/or update. Such a fee depends on the nature and complexity of your request. Information on the processing fee will be made available to you prior to making the request.

## How To Contact Us

For any queries, clarifications or requests on any aspect of this Statement, the exercise of your rights pertaining to your personal information or to provide any feedback that you may have about our processing of personal information, please visit any of our branches or get in touch with our Contact Center via our 24 hour hotline at (632) 89-100 or available toll-free numbers listed [here](#). You may also email us at [bpi\\_investment@bpi.com.ph](mailto:bpi_investment@bpi.com.ph) which is manned during business hours.

You may also write our Data Privacy Officer at:

### DATA PROTECTION OFFICER

BPI Investment Management, Inc.  
3/F Insular Life Building  
Ayala Avenue corner Paseo de Roxas  
Makati City 1226  
Philippines

## Changes to Our Privacy Statement

We may modify or amend this Privacy Statement from time to time to keep up with any changes in relevant laws and regulations applicable to us or how we collect, use, protect, store, share or dispose of your personal information. Any relevant updates will be posted on the ALFM website.

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### Definitions:

**Personal Information/Data** - refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

**Sensitive Personal Information/Data** - refers to personal information:

- a. About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
- b. About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
- c. Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
- d. Specifically established by an executive order or an act of Congress to be kept classified.